McKool Smith

Daniel W. Levy Direct Dial: (212) 402-9412 E-mail: dlevy@mckoolsmith.com One Manhattan West 395 Ninth Avenue, 50th Floor New York, NY 10001

Telephone: (212) 402-9400

Facsimile: (212) 402-9444

December 4, 2023

By ECF

The Honorable Naomi Reice Buchwald United States District Judge Southern District of New York 500 Pearl Street, Room 2270 New York, New York 10007

> Re: <u>Stein and Lhote v. Skatteforvaltningen</u> 23 Civ. 2508 (NRB)

Dear Judge Buchwald:

We write on behalf of Plaintiffs-Counterclaim Defendants Matthew Stein and Jerome Lhote and jointly with counsel for Counterclaim Defendant Luke McGee.

We respectfully request permission to file an overlength pre-motion conference letter concerning various discovery disputes that the parties have been unable to resolve.

Those letters are typically limited to 3 pages under your Honor's Individual Practices.

In order to provide an appropriate amount of background to the unresolved discovery disputes and in the hopes that the Court can resolve them on the basis of letters alone, we request that Plaintiffs and McGee be permitted up to file a combined letter of up to 7 pages in length.

By e-mail, dated November 27, 2023, Plaintiffs and McGee sought SKAT's consent to file a letter of up to 7-pages in length and indicated that they would agree to SKAT's having the same number of pages in response. As of the filing of this letter, SKAT has not responded to our request for its consent.

Respectfully submitted,

 $/_{S}/$

Daniel W. Levy

cc: All Counsel (by ECF)

McKool Smith

Case 1:23-cv-02508-NRB Document 67 Filed 12/04/23 Page 2 of 2

The Honorable Naomi Reice Buchwald December 4, 2023 Page 2

Plaintiffs and McGee may file a pre-motion conference letter of up to 7 pages in length.

SO ORDERED.

NAOMI REICE BUCHWALD UNITED STATES DISTRICT JUDGE

Date: December _____, 2023 New York, New York